

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION**

CMBB LLC,)	
)	
Plaintiff,)	
)	
vs.)	No. 08 cv 1201
)	
Lockwood Manufacturing Inc., Jennifer)	Judge Shadur
M. Bryan, and Cainco Equipamentos)	
Para Panificado, Ltd.,)	Magistrate Judge Valdez
)	
Defendants.)	

**DEFENDANTS' MOTION FOR ADDITIONAL TIME
TO RESPOND TO AMENDED COMPLAINT**

Defendants Lockwood Manufacturing, Inc., Jennifer M. Bryan, and Cainco Equipamentos Para Panifiocado, Ltd., through their attorneys, move this Court for leave to respond to Plaintiff's Amended Complaint on or before April 30, 2008. In support of this motion, Defendants state as follows:

1. Although Plaintiff filed its complaint on February 28, 2008, that complaint was stricken by the Court *sua sponte* on or about March 3, 2008 for failing to properly establish subject matter jurisdiction.

2. On March 12, 2008, Plaintiff reinstated the case and filed an amended complaint. Accordingly, although Defendants were served in early March and appeared on March 18, 2008, their response to the Amended Complaint is not due until April 1, 2008 at the earliest.

3. Since counsel has only recently been retained and is still in the process of investigating the facts of this case and since one of their clients is located in Brazil, Defendants will need additional time to prepare an appropriate response, including whether to move to dismiss the Brazilian defendant for lack of personal jurisdiction.

4. On March 26, 2008 Defendants e-mailed Plaintiff's counsel requesting additional time to answer or otherwise plead. Plaintiff's counsel agreed to the additional time.

WHEREFORE, Defendants ask that this Court extend the time for Defendants to respond to the Amended Complaint to on or before April 30, 2008.

Defendants,

By: /s/Anthony C. Valiulis
One of Their Attorneys

Anthony C. Valiulis
Lorne T. Saeks
Much Shelist Denenberg
Ament & Rubenstein PC
191 North Wacker Drive
Suite 1800
Chicago, Illinois 60601
312-521-2000